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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

January 22, 1998

Mr. Charles Hansen
U.S. Department of Energy
825 Jadwin, MSIN: S7-41
Richland, WA 99352

Mr. E. S. McGinley
Fluor Daniel Hanford, Inc.
2420 Stevens Ctr., MSIN: H8-68
Richland, WA 99352

Mr. Duane Renberger
Waste Management Hanford, Inc.
P.O. Box 700, MSIN: T3-03
Richland, WA 99352



Dear Messrs. Hansen, McGinley, and Renberger:

Re: 219-S Waste Analysis Plan per Corrective Measure #3, March 25, 1997, Notice of
Correction at the 222-S Laboratory Complex

The Washington State Department of Ecology (Ecology) issued a Notice of Correction to the U.S. Department of Energy (USDOE), Fluor Daniel Hanford, Inc. (FDH), and Waste Management Hanford, Inc. ([WMH], previously Rust Federal Services of Hanford, Inc) on March 25, 1997. The Notice of Correction identified three violations of the Washington Administrative Code (WAC), Chapter 173-303, Dangerous Waste Regulations, at the 222-S Laboratory Complex on the Hanford Site. The Notice of Correction established corrective measures to resolve the outstanding violations by April 9, 1997. Ecology granted time extensions as requested by USDOE and the contractors for completion of the Corrective Measures.

Corrective Measure #3 from this Notice of Correction required USDOE, FDH, and WMH to conduct verification of all waste to be transferred to the 219-S tank system. Ecology has worked with USDOE and the contractors to develop an adequate addendum to the 222-S Laboratory

Complex waste analysis plan (WAP Addendum) to complete the actions required in Corrective Measure #3 Ecology has communicated the requirements to complete this corrective measure

by implementation of an adequate WAP Addendum through formal communications and meetings since issuance of the March 25, 1997, Notice of Correction.

On September 22, 1997, USDOE submitted a revised 219-S WAP Addendum to Ecology. Ecology's review of this WAP Addendum revealed that many of the major issues discussed at length with USDOE, FDH, and WMH were not incorporated in the September 22nd WAP Addendum. In particular, the WAP

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Addendum submitted to Ecology on April 22, 1997:

- 1) Failed to provide the procedures whereby the 222-S Laboratory Complex will confirm its knowledge about a dangerous waste before it accepts it for management in the 219-S tank system, and
- 2) Failed to define procedures to verify that the generator's description of his waste is accurate.

In general, the April 22nd WAP Addendum did not meet the requirements of WAC 173-303-300, General Waste Analysis primarily due to excessive use of discretionary language in the WAP Addendum. A definitive presentation of all verification activities that will be conducted by the 222-S laboratory Complex to determine that a generator's knowledge of his waste is accurate prior to management in the 219-S tanks system is required in the WAP Addendum.

Ecology is disappointed by the failure of USDOE and its contractors to define basic waste verification procedures and parameters in such a fundamental document. Therefore, Ecology herein presents, as an enclosure with letter, a WAP Addendum containing the minimum procedures and parameters required to complete Corrective Measure #3.

After reviewing the enclosed WAP Addendum, Ecology suggest appropriate technical and management representatives from USDOE, FDH, and WMH meet with Ecology technical staff and management to insure the contents and requirements of the enclosed WAP Addendum are clearly understood. Ecology suggests such a meeting be held the week of February 9 - 13, 1998.

As stated in the March 25, 1997, Notice of Correction, waste generated outside of the 222-S Laboratory Complex and directed to the 219-S tank system must be authorized on a case by case basis until an acceptable WAP Addendum is in place.

If you have any questions or concerns regarding this letter, please contact me at (509) 736-3031.

Sincerely,



Bob Wilson, Compliance Inspector
Nuclear Waste Program

BW:ch
Enclosure

cc: Paul Carter, USDOE
Gloria Williams, USDOE
Carl Mattsson, FDH
John Winterhalder, WMH
Mary Lou Blazek, ODOE
Administrative Record: 222-S Laboratory Complex and 219-S Tank System

bcc: Alisa Huckaby, Ecology
Moses Jaraysi, Ecology
Ron Skinnarland, Ecology
Alex Stone, Ecology
Mike Wilson, Ecology